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*Attorneys for Plaintiffs,*  
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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JOANNA ARDALAN, ESQ, an  
individual; ONE LLP, a California  
Limited Liability Partnership,

Plaintiff,

v.

BINOTECH LLC,; KAREN  
MUMMERT; MICHAEL MUMMERT;  
ABDULLAH LIMITED COMPANY,  
CODERS CUBE LLC, HIK TECH  
LLC, DATA PATCH, INC., DOE 1,  
d.b.a LAW INTEGRAL, LLC, business  
entity unknown; DOE 2, d.b.a DEPUTY  
TRADEMARK. business entity  
unknown; DOE 3, p.k.a MICHELLE  
SPRAGUE, an individual; DOE 4, d.b.a  
TRADEMARK INTEGRAL, business  
entity unknown; DOE 5, d.b.a  
BRANDREGISTRATION.ORG,  
business entity unknown; and DOES 6  
through 10, inclusive,

Defendants.

Case No. 8:23-cv-01243-KK-(DFMx)  
Hon. Kenly Kiya Kato

**DECLARATION OF JOANNA  
ARDALAN IN SUPPORT OF EX  
PARTE APPLICATION FOR AN  
ORDER GRANTING EARLY  
DISCOVERY TO SERVE  
SUBPOENA ON JP MORGAN  
CHASE BANK AND COMMUNITY  
FEDERAL SAVINGS BANK**

1 I, Joanna Ardalan, am a party in the above captioned action and am a partner  
2 at the law firm One LLP. I have personal knowledge of the facts stated below and if  
3 called to testify I could and would testify as follows:

4 1. On September 9, 2024, a small business owner “client” of Defendant  
5 Deputy Trademark and Defendant Law Integral, Jarrod Cruzat, reached out to me at  
6 my One LLP email address. Attached as **Exhibit A** is a true and correct copy of Mr.  
7 Cruzat’s email message to me, which included an email chain of correspondence  
8 between “Joanna Ardalan” from Law Integral and Mr. Cruzat. This email message  
9 was the first time I received a communication from Mr. Cruzat. The most recent  
10 email in Exhibit A is my response to Mr. Cruzat. Mr. Cruzat explained to me  
11 telephonically that he sought legal services to secure registrations for a standard  
12 character mark and logo mark for “Pacific Acquisition”.

13 2. After our email exchange on September 9, 2024, Mr. Cruzat shared  
14 numerous communications between him and the people he understood worked for  
15 Law Integral and Deputy Trademark. On September 10, 2024, Mr. Cruzat provided  
16 me with bank account information that he had used to wire money to Law Integral  
17 and Deputy Trademark. I have spoken with Mr. Cruzat telephonically and he  
18 confirmed that he spent at least \$30,000 on these two entities.

19 3. Mr. Cruzat also shared with me “trademark registrations” that  
20 Defendants claimed were issued for his trademarks. True and correct copies of the  
21 correspondence as well as the attached “trademark registrations” are attached as  
22 **Exhibit B**. These registrations are fake. Aside from looking different than real  
23 registrations, there is no registration number on the certificate, only a serial number.

24 4. Attached as **Exhibit C** is a true and correct copy of correspondence and  
25 attachments sent from an “IP Paralegal” at Brand Legal Services that was sent to  
26 Mr. Cruzat. It included a cease and desist letter sent from Brand Legal Services  
27 claiming that there was another unnamed party who used the mark “Pacific  
28 Acquisition” and had priority. It included doctored screenshots from the USPTO and

1 the Canadian Trademark Office website. I know these are doctored because when I  
2 visited both websites, another entry for “Pacific Acquisition” does not appear in the  
3 records. Attached as **Exhibit D** is a true and correct copy of a USPTO search which  
4 shows only Mr. Cruzat has a pending trademark registration for “Pacific  
5 Acquisition.” No other party has submitted an application for this mark. “Pacific  
6 Acquisition” does not appear in the Canadian Trademarks Database Search.  
7 Attached as **Exhibit E** is a true and correct copy of a search I conducted in the  
8 Canadian Trademarks Database for “Pacific Acquisition”.

9 5. Attached as **Exhibits F and G** are true and correct screenshots I  
10 received from Mr. Cruzat that showed confirmation of wire payments he sent to  
11 Defendants. I redacted the bank account number as required by ECF rules.

12 6. Attached as **Exhibit H** is a true and correct copy of an email message I  
13 received from Mr. Cruzat, which includes the JP Morgan bank information for the  
14 wire transfer. I redacted the bank account number as required by ECF rules.

15  
16 I declare under penalty of perjury that the facts stated herein are true and correct.

17  
18 Executed this 29th day of October 2024, in Los Angeles, California.

19  
20 /s/ Joanna Ardalan

21 Joanna Ardalan  
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